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Attorneys for Plaintiff
Salerno Medical Associates, LLP

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SALERNO MEDICAL ASSOCIATES,
LLP,

Plaintiff,

v.

INTEGRITY PRACTICE SOLUTIONS,
LLC; INTEGRITY MEDICAL SYSTEMS,
LLC; CHINTAN TRIVEDI; JOHN DOES
1-10; and ABC CORPORATIONS 1-10,

Defendants.

Civil Action No.
2:20-cv-07076-JMV-JBC

Hon. John M. Vazquez, U.S.D.J.
Hon. James B. Clark, U.S.M.J.

**NOTICE OF MOTION FOR A
PRELIMINARY INJUNCTION**

Oral Argument Requested

Returnable: July 10, 2020

TO: Integrity Medical Systems, LLC
Integrity Practice Solutions, LLC
Chintan Trivedi
c/o Michelle L. Greenberg, Esq.
84 Bloomfield Avenue
Pine Brook, New Jersey 07058

PLEASE TAKE NOTICE that on **Monday, July 6, 2020**, or as soon thereafter as counsel may be heard, plaintiff, Salerno Medical Associates, LLP (**“Plaintiff”** or **“SMA”**), by and through its attorneys, Mandelbaum Salsburg, P.C., shall apply before the Honorable John Michael Vazquez, U.S.D.J., U.S. District Court for the District of New Jersey, 50 Walnut Street, Newark, New Jersey 07102, for a preliminary injunction (the **“Motion”**) enjoining defendants, Integrity Medical Systems, LLC (**“IMS”**), Integrity Practice Solutions, LLC (**“IPS”**), Chintan Trivedi (**“Mr. Trivedi”**), John Does 1-10, and ABC Corporations 1-10 (all named defendants collectively, **“Defendants”**), and all persons acting in concert with them, from using, disclosing, transferring, deleting, destroying, manipulating, and/or otherwise restricting SMA’s access to, the protected health information (**“PHI”**) pertaining to 16,000 of SMA’s patients, including, without limitation, patients’ names, patients’ telephone numbers, patients’ addresses, patients’ medical records, patients’ radiograph images, laboratory results, and other information and documents regarding a patient’s health status and the provision of, and payment for, medical services provided to SMA patients (the **“SMA Patient Data”**), and requiring Defendants forthwith to return, or otherwise cause the migration of, the SMA Patient Data to SMA.


PLEASE TAKE FURTHER NOTICE that, in support of the Motion, SMA shall rely upon its Amended Verified Complaint, the declarations submitted in

support thereof and the exhibits annexed thereto, and the Memorandum of Law, and all other pleadings, papers, evidence, and Orders on file in this matter.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 7.1(e), a copy of the proposed form of Order is included herewith.

PLEASE TAKE FURTHER NOTICE that, pursuant to Local Civil Rule 78.1(b), SMA hereby requests oral argument; and

MANDELBAUM SALSBURG, P.C.
Attorneys for Plaintiff

By: 

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DATED: June 26, 2020
Roseland, New Jersey